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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF FLORENCE W. SHULMAN; ALAN M. GOLDBERG, in his capacity as Personal Representative of the Estate of Florence W. Shulman; KEVIN SHULMAN in his capacity as Trustee of the Florence Shulman Pourover Trust; CARAN RUGA ROSS, in her capacity as Trustee of the Florence Shulman Pourover Trust;

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04606 (SMB)

FLORENCE SHULMAN POUROVER TRUST, in its own capacity and in its capacity as a Limited Partner of FAS Partners, L.P.; FAS PARTNERS, L.P.; SHULMAN FAMILY CORPORATION, in its capacity as General Partner of FAS Partners, L.P.; ALVIN E. SHULMAN POUROVER TRUST, in its capacity as Limited Partner of FAS Partners, L.P.; and ALVIN E. SHULMAN, in his capacity as Trustee for the Alvin E. Shulman Pourover Trust,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: December 21, 2015.
- 2. Fact Discovery shall be completed by: March 3, 2017.
- 3. The Disclosure of Case-in-Chief Experts shall be due: May 24, 2017.
- 4. The Disclosure of Rebuttal Experts shall be due: July 24, 2017.
- 5. The Deadline for Completion of Expert Discovery shall be: August 22, 2017.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before August 29, 2017.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before September 12, 2017.
- 8. The Deadline for Conclusion of Mediation shall be: On or before January 10, 2018.

Dated: New York, New York October 16, 2015

Of Counsel:

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